



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

Jose Alberto RAMIREZ-Angulo,

Defendant.

Magistrate Case No.:

'08 MJ 8016

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960
Importation of a Controlled
Substance (Felony)

The undersigned complainant being duly sworn states:

That on or about January 12, 2008, within the Southern District of California, defendant Jose Alberto RAMIREZ-Angulo did knowingly and intentionally import approximately 28.54 kilograms (62.78 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Paul Lewenthal, Special Agent
U. S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 14TH
DAY OF JANUARY 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Jose Alberto RAMIREZ-Angulo

4 STATEMENT OF FACTS

5 This complaint is based on the reports, documents, and notes
6 furnished to U.S. Immigration and Customs Enforcement Special
7 Agent Paul Lewenthal.

8 On January 12, 2008, at approximately 1920 hours, Jose
9 Alberto RAMIREZ-Angulo attempted to enter into the United States
10 at the Calexico, California, West Port of Entry, from the
11 Republic of Mexico. RAMIREZ was the driver and sole occupant of a
12 1990 Jeep Comanche pick-up truck.

13 During pre-primary operations, Customs and Border Protection
14 Canine Officer J. Jones was utilizing his canine CE-89 when he
15 came upon RAMIREZ' vehicle. CE-89 alerted to the gas tank area of
16 the vehicle. Officer Barroso was advised of the canine's alert
17 and RAMIREZ was removed from the vehicle. The vehicle was driven
18 to secondary inspection where Officer E. Garcia took over the
19 inspection.

20 In secondary inspection, Officer Garcia asked RAMIREZ who
21 the vehicle belonged to. RAMIREZ told Officer Garcia that he had
22 owned the vehicle for the past three years and that he was en
23 route to Palm Springs, California. RAMIREZ gave Officer Garcia a
24 negative Customs declaration.

25 A contractor was called to remove the gas tank. Further
26 inspection of the gas tank revealed an access plate on top of the
27 gas tank. Officer Garcia located several vacuum sealed packages
28 within the gas tank. Officer Garcia discovered and removed a
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1 total of twenty-five (25) packages. A package was probed
2 revealing a green leafy substance. This substance field-tested
3 positive for marijuana. The total weight of the marijuana
4 packages was 28.54 kilograms.

5 RAMIREZ was arrested for importation of marijuana into the
6 United States. RAMIREZ was advised of his rights in Spanish by
7 Special Agent P. Lewenthal. RAMIREZ stated he understood his
8 rights and agreed to answer questions. RAMIREZ admitted knowledge
9 of the marijuana concealed in the vehicle stating that he was
10 going to be paid \$3,000 to smuggle the marijuana to Palm Springs,
11 California.

12 RAMIREZ was transported to the Imperial County Jail to await
13 his Initial Appearance before a U. S. Magistrate Judge in El
14 Centro, California.
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